

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA**

**UNITED STATES OF AMERICA**

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**CRIMINAL NO: 12-099**

**v.**

\*

**SECTION: "A"**

**RUBEN JOSEPH BRYANT**

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\*   \*   \*

**FACTUAL BASIS**

Should this case were to proceed to trial, both the Government and the defendant, RUBEN JOSEPH BRYANT, do hereby stipulate and agree that the following facts set forth a sufficient factual basis for the crimes to which the defendant is pleading guilty. The Government and the defendant would further stipulate that the Government would have proven, through the introduction of competent testimony and admissible, tangible exhibits, the following facts, beyond a reasonable doubt, to support the allegations in the one-count Bill of Information now pending against the defendant.

Special Agents of the United States Secret Service ("USSS"), New Orleans Field Division, would testify that in September 2009, the USSS received information from Certegy Check Services regarding RUBEN JOSEPH BRYANT ("BRYANT"), the owner of a company named TT&L

Trucking, LLC. Certegy Check Services (“Certegy”) provided check guarantee services to authorized merchants by selling check guarantee point of sale terminals that scan the check account/routing numbers printed on checks, digitalize that information, and send the information over telephone lines so that check transactions could occur with the ease and convenience of credit card transactions. Certegy was involved in interstate commerce throughout the United States, including in the Eastern District of Louisiana.

USSS Special Agents would further testify that they spoke with a Certegy fraud investigator, who informed them that BRYANT or one of his associates had used counterfeit checks to cash at Wal-Mart stores or to purchase merchandise from retail stores such as Best Buy and Lowe’s in the Eastern District of Louisiana and elsewhere. Certegy identified numerous counterfeit checks drawn on banks including Bank of America, Central Progressive Bank, Whitney Bank, Hancock Bank, Community Bank, Capitol One Bank, JP Morgan Chase Bank, and Regions Bank, all of whose accounts were insured by the Federal Deposit Insurance Corporation (“FDIC”) and all of which operate in or the activities of which affect interstate commerce, that BRYANT or his associates negotiated and passed or attempted to negotiate and pass from in or about December 2008 to in or about November 2009.

Certegy provided the USSS Special Agents a spreadsheet containing information regarding these fraudulent transactions, the amount of which totaled approximately \$226,980. Certegy declined some of these fraudulent transactions but approved the majority of them. An example of one of these fraudulent transactions occurred on or about August 3, 2009, when BRYANT purchased \$4,915.45 in merchandise at a Best Buy store in Slidell, Louisiana with a counterfeit check, check

number 7542, purportedly issued by “TT & L Trucking LLC” and appearing to be a check drawn on Capital One Bank. The account number that BRYANT used to create and print this counterfeit belonged to a real company named Leacon-Sunbelt Inc. Another fraudulent transaction occurred on or about August 22, 2009, when BRYANT purchased \$4,505.23 in merchandise at a Zale’s store in Houma, Louisiana with a counterfeit check, check number 7140, purportedly issued by “TT & L Trucking LLC” and appearing to be a check drawn on Central Progressive Bank. BRYANT had used a fictitious, or non-existent, account number in creating and printing this counterfeit check. On or about September 5, 2009, one of BRYANT’s associates purchased \$4,784.98 in merchandise from a Best Buy store in Covington, Louisiana with a counterfeit check, check number 7531, purportedly issued by “Williams Construction” and appearing to be drawn on Whitney National Bank. The account number that BRYANT used to create and print this counterfeit check belonged to a real company named Specialized Industrial Maintenance, Inc.

On January 27, 2010, USSS Special Agents spoke with BRYANT. After advising BRYANT of his Miranda rights, which BRYANT waived both verbally and in writing, the agents interviewed BRYANT, who admitted to owning a truck business named TT&L Trucking. He informed the USSS agents that he began counterfeiting checks because he could not find work and had no income coming in. He had received real bank account numbers belonging to others, such as real companies, from his associates and he created and printed counterfeit checks using a laptop computer and the Versacheck or Peachtree software. He also created bogus account numbers and created and printed counterfeit checks using these fictitious, or non-existent, account numbers with his company, TT&L Trucking, LLC, as the account holder. He would, then, give these checks to others to purchase

merchandise from retailers such as Lowe's and Best Buy or to cash at Wal-Mart stores. BRYANT also purchased merchandise himself with these counterfeit checks. If others were involved, they would then split the proceeds from the checks cashed and from the sale of the merchandise. BRYANT also opened several bank accounts in the name of his company with \$100 and then write checks to retailers in amounts that exceeded the deposit amounts. BRYANT also admitted to creating and printing counterfeit check number 7531 purportedly drawn on Whitney National Bank and giving it directly to his associate to pass and negotiate on September 5, 2009, as explained above.

The above facts would have proven beyond a reasonable doubt that BRYANT produced and printed counterfeit checks, which appeared to have been issued under the authority of the various financial institutions, some with valid, current bank account numbers for real entities that had not authorized the issuance of such checks, and others with fictitious account numbers, which were passed and negotiated by BRYANT or one of his associates in exchange for something of value.

**APPROVED AND ACCEPTED:**

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RUBEN JOSEPH BRYANT  
Defendant

\_\_\_\_\_  
Date

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CYNTHIA M. CIMINO (30874)  
Attorney for Defendant

\_\_\_\_\_  
Date

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LOAN "MIMI" NGUYEN (23612)  
Assistant United States Attorney

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Date